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98-143

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11600 Carmel Drive
Lakewood, CO 80215
September 9, 1998

Federal Communications Commission
Gettysburg, PA

RE: NPRM 98-143 / ARRL Amateur Radio licensing restructuring proposal

Dear Mr. Chairman and Commissioners:

The ARRL has quietly lobbied a licensing restructuring proposal to the FCC, and intimated, falsely, its approval by the amateur community. All this was done without the knowledge and consent of the amateur radio community.

Quoting from the ARRL letter of July 22, 1998 to the FCC:

ARRL: "The League's Board of Directors, which constitutes the most representative Body of amateur radio operators in the country..."

1. THE ARRL HAS NO AUTHORITY TO SPEAK, ACT, OR INITIATE ON MY BEHALF. I am not an ARRL member. At no time have I authorized them or any other amateur radio entity to represent me in any way. They are only a membership club. Claiming to represent me, directly or indirectly, constitutes oppression and usurpation of my rights and is contrary to 18 U.S.C. § 241, 242.
2. ARRL IS NOT ENTITLED to favored status with the FCC, nor is any other group.
3. THIS ARRL PROPOSAL HAS NO APPROVAL BY ANY MAJORITY, other than that of their own closed "Board." Even their membership was given no chance to vote on it. The ARRL itself does not constitute a majority; less than 24% of amateur radio operators belong.

ARRL: "...needed opportunity for simplification of what is now an overly complex licensing structure for the Amateur Service."

It is ARRL who spawned the present "overly complex licensing structure."

ARRL: "Participation in the Amateur Service can be increased, and the benefits of Amateur Radio can be made available to more people. By increased participation, Amateur Radio can provide even more service to the United States than it does currently, with a simpler licensing structure."

4. **MISREPRESENTATION.** ARRL is selling the downgrading of licensing standards under the guise of “simpler structure.” “The benefits of Amateur Radio” are *already available to all people*. As with any avocation or interest, there are *standards* which one must meet to secure a *privilege*.

5. **ARRL LOGIC CONTRADICTS.** ARRL claims that such a simplified structure and eased requirements will “increase participation,” yet says later that portions of the exams should be made more difficult.

6. **ARRL GIVES NO JUSTIFICATION FOR REDUCING TELEGRAPHY STANDARDS.** Amateur Radio relies on standards and the testing process to ensure quality. Stubbornness, laziness or personal dislikes are not valid reasons within any avocation, such as aviation, medicine, or sports, to lower qualification or performance standards. CW testing is essential to the maintenance of quality of the Amateur service, as it is based on learning by rote memorization and practice, actions that cannot be fabricated, thereby proving dedication and motive. *The telegraphy exams have already been simplified*. With study and practice, thousands have and continue to pass the present Amateur exams. *No problem exists*.

7. **DEGRADATION, NOT SIMPLIFICATION, WILL RESULT.** Their proposal is not just a simplification of the licensing structure. It is a downgrading of licensing requirements. Further, the proposed four license classes are homogenized, insulting those who qualified under higher standards.

I oppose any downgrading of licensing requirements, grandfathering of classes, or expansion of the phone subbands. RETAIN all present CW requirements at present test speeds.

ARRL has tampered with the amateur licensing structure more than once. It “solved” nothing. The “problems” concerning *Amateur Radio* were imaginary. *This ARRL licensing restructuring proposal only serves ARRL pecuniary interests, not Amateur Radio*.

REJECT THIS ARRL PROPOSAL.

Yours truly,

Raymond J. Laine